



C.L. "BUTCH" OTTER – GOVERNOR
RUSSELL S. BARRON – DIRECTOR

IDAHO DEPARTMENT OF HEALTH & WELFARE

Julie A. Hammon - Administrator
STATEWIDE SELF RELIANCE PROGRAMS
450 West State Street, 2nd Floor
P.O. Box 83720
Boise, Idaho 83720-0036
PHONE 208-334-5815
FAX 208-334-5817

SNAP Employment and Training Program

3rd Party Partner Handbook

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COMMON ACRONYMS & DEFINITION OF TERMS

Acronym	Definition
ABAWD	Able-Bodied Adults without Dependents
Agreement	a legal instrument of financial assistance between a pass-through entity and a non-Federal entity
CIN	IDHW Client Identification Number
CFR	Code of Federal Regulations
E&T	Employment and Training
ETS	Employment and Training System
Fiscal Year	FNS fiscal year runs from October 1 through September 30
FNS	USDA Food and Nutrition Service
IDHW	Idaho Department of Health and Welfare
IPV	Intentional Program Violation
JSAP	Job Search Assistance Program
Non-Federal entity	a state, local government, Indian tribe, institution of higher education (IHE), or nonprofit organization that carries out a Federal award as a recipient or subrecipient
OMB	Office of Management and Budget
Pass-through entity	A non-Federal entity providing a subaward to a subrecipient to carry out part of a Federal program
PDAP	Partner Data Access Portal
Protected PII	Protected Personally Identifiable Information means an individual's first name or first initial and last name in combination with any one or more of types of information, including, but not limited to, social security number, passport number, credit card numbers, clearances, bank numbers, biometrics, date and place of birth, mother's maiden name, criminal, medical and financial records, educational transcripts. This does not include PII that is required by law to be disclosed. (See also §200.79 Personally Identifiable Information (PII)).
SNAP	Supplemental Nutrition Assistance Program – formerly Food Stamps
TAFI	Temporary Assistance for Families in Idaho
TANF	Temporary Assistance for Needy Families
Work Activity	goods or services providing a SNAP participant with an opportunity to acquire the general skills, knowledge, and work habits necessary to improve employment outcomes
USDA	United States Department of Agriculture

OVERVIEW OF SNAP PROGRAM

IDHW administers the SNAP E&T program as authorized by the Agricultural Act of 2014. States must provide E&T services to SNAP participants as a part of administering SNAP. The SNAP E&T program strives to help active SNAP participants obtain marketable and in demand skills resulting in employment opportunities. Idaho mandates most SNAP participants to register for work and participate in work activities to maintain their SNAP eligibility. The SNAP E&T program is an important part of the SNAP program to provide work activities for job-driven training, tools, and access to career pathways leading to sustainable jobs or job advancement.

IDHW determines the SNAP eligibility and E&T exemptions to the Idaho mandate. For more information on SNAP eligibility requirements go to <https://www.livebetteridaho.org/food-stamps-snap>. IDHW contracts with MAXIMUS to refer and/or provide E&T services for SNAP participants. MAXIMUS is responsible for helping to ensure access to E&T services while delivering a cluster-based approach to career pathways, supported by traditional case management. With MAXIMUS collaboration, IDHW facilitates partnerships to create sustainable pathways to employment or improved employment. FNS provides the federal funding to IDHW and has oversight authority for Idaho's SNAP E&T program. IDHW

leverages FNS SNAP 50-50 funds as a pass-through entity to reimburse up to 50 percent of allowable E&T costs to established partners who already provide the services to the community. SNAP participants will be referred from MAXIMUS to participate in E&T services. Partners would then bill IDHW for the agreed service costs to be reimbursed up to 50 percent.

This 3rd Party Partner Handbook details the standard set of policies and guidance for delivering E&T services under the Idaho SNAP program. This handbook does not cover every situation or scenario a Partner may encounter in their day-to-day activities. Partners receive individual support from IDHW for rare cases.

PROGRAM CONTACTS

Name and Title	Contact Reason	Phone	Email
Kristin Matthews, SNAP Program Manager	<ul style="list-style-type: none"> • SNAP policy inquiries • Change in the key person specified in the Agreement • Budget reviews • Allowable services • Invoicing and reporting 	(208) 334-5553	Kristin.Matthews@dhw.idaho.gov
Sarah Buenrostro, E&T Program Manager	<ul style="list-style-type: none"> • Operational inquiries • Customer service • SNAP participant complaints 	(208) 334-4934	Sarah.Buenrostro@dhw.idaho.gov
	PDAP adding or deleting users		PartnerAccess@dhw.idaho.gov
	Submit Participant Roster and Invoice		CERMTeam@dhw.idaho.gov
Shane Leach, Bureau Chief, Compliance & Support	Report a breach of confidentiality	(208) 859-1033	Shane.Leach@dhw.idaho.gov
Tracie Hinds Statewide Program Director, MAXIMUS	Referrals from MAXIMUS	(208) 488-6885	TracieHinds@maximus.com

DATA SECURITY REQUIREMENTS

The Partner is responsible for requesting removal of access for staff that no longer need PDAP, or other IDHW system, because they are no longer working with SNAP E&T activities per the terms of the PDAP MOU. The Partner must take such security precautions to prevent disclosure of confidential data and information such as, but not limited to:

- Process for destruction of confidential electronic and paper records maintain the terms of the Agreement.
- Follow policy and procedures for expiring passwords.
- Policy for back-up of data and have available upon request.
- Install, maintain, and use antivirus, anti-spyware, and anti-malware software on the organization's computers and all other electronic devices used by the employees to access IDHW systems.
- Current with security patches for any 3rd party vendors.
- Manually lock devices whenever unattended and set devices to lock automatically after a period of inactivity.

- SNAP data provided under the terms of the Agreement must be excluded from data sharing agreements with 3rd parties, subcontractors, or other organizations.

PROGRAM REQUIREMENTS

The Partner services, available funding, and individual expenses must not be different for SNAP participants and the public. SNAP participants are expected to receive the same services and supervision as non-SNAP participants to meet the Partner's expectations and successfully complete the Partner's program. The Partner shall have uniform standards and provide services to the community as specified by their business mission regardless of IDHW agreements.

IDHW, or its designated agent, and the E&T Partners have a responsibility to coordinate services for co-enrolled SNAP participants to prevent duplication of services. Duplication of service means the individual receives the same E&T component or the same supportive service from multiple partners.

Partners maintain records sufficient to detail the history of the reimbursement activity and SNAP participant's participation in the E&T services and have upon request. Partners are responsible for good administrative practices and sound business judgment including clear and accurate policy and procedures of confidentiality requirements, data security, and procurement.

Use of IDHW's name is prohibited in any advertising or promotional media, including press releases, as a customer or client without the prior written consent of IDHW.

Partner must, at a minimum, provide the equivalent insurance coverage for real property and equipment. The Partner is required to maintain current certificates on file with IDHW and to provide updated certificates upon request.

Partner is required to implement any mandatory changes to E&T Program requirements released by IDWH or USDA. IDHW will notify Partner of these changes, and provide training as needed.

RELEASE OF INFORMATION

SNAP participants must complete and sign a Release of Information/Consent form before the Partner can access their confidential information on IDHW systems. The Partner is required to maintain a record of the form and have available upon request.

Release clause language must be included on forms including name, date, signature and either date of birth or the IDHW CIN.

Below is the recommended content. Contact the SNAP Program Manager to review content variations.

I consent to the gathering, use, and disclosure of my information by **[organization name]** and the Idaho Department of Health and Welfare as necessary for the Idaho SNAP Employment and Training program. This consent is valid for three years from the date signed, unless I revoke this consent, in writing, to the extent of the information already shared.

CONFIDENTIALITY

The Partner uses of personal, confidential, and other information gained because of the Agreement only for the purposes directly related to the administration per the terms of the Agreement. Any personal use of customer information is strictly prohibited. The Partner shall return, or certify the destruction of, such information if requested in writing by IDHW.

CONFLICT OF INTEREST

The Partner must have a policy and procedure to prevent potential conflict of interest or accessing information for personal gain. For example, an employee working on a SNAP case for a family member or friend is prohibited.

DISCRIMINATION

Individuals who believe they have been subjected to discrimination for reasons of age, race, color, sex, handicap, religious creed, national origin, or political beliefs, may file a written complaint with the USDA by writing to: USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410, or by calling (202) 720-5964 (voice and TDD). Staff members should explain the FNS complaint system to everyone who expresses an interest in filing a discrimination complaint and advise the individual of his or her right to file either in the Federal or the State System or in both systems. The Partner must have a policy and procedure for notifying individuals of how to file discrimination complaint.

CUSTOMER COMPLAINTS

The Partner shall treat the Department, its officers, agents, employees, contractors, and customers with respect and dignity and demonstrate a caring attitude to all who ask for assistance. The Partner shall work with the Department, its officers, agents, employees, contractors, and customers to resolve any complaints. The Partner shall email the E&T Program Manager for escalated complaints from SNAP participants.

REPORTING FRAUD

The Partner must report any intentional action which causes an individual or welfare partner/provider to receive benefits to which they are not entitled. The link to the IDHW website provides instructions for reporting fraud.

<http://healthandwelfare.idaho.gov/AboutUs/FraudReportPublicAssistanceFraud/tabid/136/Default.aspx>

MONITORING & AUDITING

Records and documents relevant to E&T activities, including but not limited to fiscal records, shall be available for and subject to inspection, review, or audit; and copying by IDHW, other personnel duly authorized by IDHW, and by federal inspectors or auditors. The Partner shall make its records available to such parties at reasonable times, at either the Partner's principal place of business or upon premises designated by IDHW.

FISCAL REQUIREMENTS

Keep adequate fiscal records which sufficiently and properly verify costs, funding sources, and participation records of any nature and have available upon request.

Expenses an individual has paid for that are reasonable, necessary, and directly related to participating in an allowable E&T service may be reimbursed if the charges are the same for the public. Examples of participant reimbursements would be books or training manuals, uniforms, transportation expenses, or personal safety items required to participate in the E&T service. Thorough documentation and tracking of participant payments and reimbursements are required to prevent duplication.

Reimbursement is not allowed for individuals repeating or reenrolling in an E&T service already invoiced and reimbursed.

BUDGET

Scope of services and operating budgets are reviewed annually using the records of the historical performance and financial forecasts. Annual budgets must be submitted to IDHW for review by June 1. IDHW must submit a State Plan to FNS for approval which provides projections of the costs for major areas of E&T program operations. Changes to budget and allocations are only approved after FNS approves the Idaho state plan and the funds are authorized by the Letter of Credit. Funds eligible for up to the 50 percent reimbursement must not be from a Federal source.

Budgets may be reviewed throughout the year if significant changes are made. A request to review may be submitted to the SNAP Program Manager. Significant changes include, but not limited to, adding, deleting, or modifying services resulting in a 10% change in the budget. IDHW will review the budget request and communicate the outcome to the Partner within 30 days of the request.

❖ Allowable Expenses

Allowable administrative costs are operational costs for reasonable and necessary expenses to operate allowable E&T services. Do not duplicate expenses accounted by the approved indirect rate. Allowable administration costs include:

- Salaries and fringe benefits of personnel involved in E&T activities and administrative support of the activities;
- Contractual costs require IDHW approval.
- Non-capital equipment and supplies such as independent financial audit costs, computer systems with a use life of a year or more, or other equipment need to accomplish allowable E&T service objectives.
- Materials such as supplies, postage, copying/printing costs, memberships, subscriptions, and professional activities.
- Travel expenses for the SNAP E&T partnership.
- Building space such as lease or rental costs and relative activities for lease management.
- Equipment and other capital expenditures such as maintenance and operational expenses; insurance expenses, furniture and equipment, intellectual property, and expenses to acquire capital assets.

❖ In-kind Expenses

Only government entities may be reimbursed for in-kind contributions. In-kind contributions must include narrative of the determination of the value of property or of the goods and services provided specifically for allowable E&T activities.

❖ Indirect Cost

Indirect costs are costs incurred in support of allowable activities directly charged to sponsoring Federal or State agencies. Indirect cost rates are documented through an indirect cost plan approved by a cognizant agency. Indirect cost rate plans are usually associated with larger entities. Very few costs are indirect. Most of the cost expenditures associated with E&T services are direct costs. If a Federal cognizant agency has approved an indirect rate, a copy of the documentation is required and the budget expenses should support the indirect cost agreement.

❖ Participant Reimbursement

Partner scholarship, fellowship, or tuition remission funds used for a SNAP participant expense to participate in the allowable E&T activity are allowable. Reimbursement to participants for reasonably necessary expenses to participate in E&T activities is limited and may require coordination. If the payment is required upfront from the SNAP participant, there should be thorough reporting standards to accurately track payments from the participant and reimbursements to the participant.

❖ Unallowable Expenses

- Bad debts, uncollected accounts or claims, and related costs.
- Contributions to an emergency reserve or similar provision for unforeseen events (contingencies). (Note: These are not insurance payments which are allowable.)
- Contributions and donations (usually these are political in nature).
- Costs that are primarily for entertainment, amusement or social activities. (Note: Meals are cited in the OMB regulations as unallowable but within the context of training, meals might be allowable.)
- Fines, violations or penalties for failure to comply with Federal, State, or Local laws.
- Payments to third parties as part of an indemnification agreement.

- Losses not covered by permissible insurance.
- Legislative expenses.
- Shortfalls in one grant cannot be charged to another Federal grant (Recovery of Costs under Federal Funding Agreements). (Note: This is not the same as charging two Federal grants for a share of the costs of the activity if both agencies benefit from the activity funded. However, an allocation basis must be established for sharing the costs in proportion to the benefit each receives.)
- Alcoholic beverages.
- Advertising and public relations unless used for recruitment of staff, acquisition of material for the grant, or publishing the results of the grant. (Note: Paid media buys for educational purposes via an outreach program are not precluded by this provision, but note that radio, television and billboard advertisements that promote SNAP benefits and enrollment are unallowable costs under SNAP regulations.)
- Alumni activities.
- Commencement and convocations.
- Legal fees that result from a failure to follow Federal, State or Local Laws. If certain conditions are met, the Federal government may allow some legal fees.
- Executive lobbying.
- Goods and services for private use.
- Housing and personal living expenses.
- Fundraising and investment management.
- Interest costs, with certain exceptions.
- Political party expenses.
- Costs incurred before approval of the outreach plan (pre-agreement costs).
- Scholarships and student aid.
- Student activity costs.
- Entertainment costs including amusement, diversion, and social activities and any associated costs
- Travel is allowable but with restrictions as to amount and level of transportation cost (for example, no first-class tickets).

INVOICE AND REIMBURSEMENT

Training must be completed prior to invoicing IDHW.

Invoices are sent directly to IDHW for approved E&T services and expenditures determined eligible for reimbursement.

The invoice of allowable E&T services and expenses for up to 50 percent reimbursement must be certified the expenses were funded only using non-federal dollars. Invoices must include a Participant Roster. The roster is an itemization of SNAP participants served that the partner is requesting reimbursement for or has received prior reimbursement.

Allowable E&T services are billed after the individual has shown up and began participating with no available refund for any registration fees, tuition, etc. and costs have been expended by the organization for services.

Funds used to provide stipends or any type of incentive to a SNAP participant receiving E&T services are not eligible for reimbursement.

IDHW may, at its sole discretion, withhold payment claimed by the Partner for services rendered if the Partner fails to satisfactorily comply with any terms or conditions of this handbook and the Agreement.

IDHW leverages FNS SNAP funds to reimburse up to 50 percent of allowable E&T expenditures to the Partner. The allowable E&T costs are determined through the approved budget. The Partner expends 100% of the program costs up front, invoices IDHW for allowable E&T expenditures, and IDHW reimburses up to 50% of the allowable E&T expenditures. The Partner can use the reimbursement monies as "local" funding for future budgets. Reutilizing the funds towards allowable E&T services is recommended.


RECOUPMENT

If IDHW determines, through a review of the Partner records, monitoring, audit or otherwise, the documentation or reimbursement is inadequate or fails to comply with the terms of the Agreement; the Partner shall refund and pay IDHW any compensation paid to the Partner arising from such noncompliance.

If a federal or state audit indicates payments to the Partner fail to comply with applicable federal or state laws, rules, or regulations; the Partner shall refund and pay IDHW any compensation paid to the Partner arising from such noncompliance, plus costs, including audit costs.

PARTICIPANT ROSTER

Documentation is the recording in the case record of the facts leading to E&T program outcomes towards employment. The documentation must be available upon request. To comply with FNS reporting requirements, reporting measures identify improvements in skills, training, work and experience for individuals in an employment and training program component. Attendance/participation must be monitored and documented on an on-going basis for everyone reimbursed through the 50-50 E&T program. The Partner is expected to continue to report progress and outcomes after any reimbursement payment is made.



IDAHO DEPARTMENT OF
HEALTH & WELFARE
SNAP E&T Participant Roster

The purpose of the Participant Roster is to gauge the performance of our statewide Partners will ensure monthly rosters are accurate.

Original Start Date: Enter the original start date of the activity.
Projected Completion Date: Enter the estimated activity completion date.
Expected Hours per Week: Enter the estimated number of hours a week required to successfully complete the activity.

Performance Outcome: Select the appropriate Outcome:
 • Certificate: Individual received a nationally recognized certification. Enter the Certificate Type.
 • Employment: Individual gained employment. Enter Employer Name, Rate of Pay, and # of hours worked per week.
 • Employment Promotion: Individual received a promotion. Enter Employer Name, Rate of Pay, and # of hours worked per week.
 Outcome Date: Enter the date the Performance Outcome was achieved.

Partner Name: Partner Name
 Partner Vendor #: Tax ID
 Reporting Month: Invoice Month

First Name	Last Name	CIN	PDAP SNAP Eligibility	DHHR 50/50 Elig	Original Start Date	Projected Completion Date	Expected Hrs per Week	Activity Type	Activity Subtype	Activity Status	Status Change Date	Performance Outcome	Certificate Type	Employer Name	Rate of Pay	# of hours per week	Outcome Date	On Invoice	Comments
<p>Enter the customer information as it appears on PDAP. Enter the CIN from PDAP with applicable zeros. PDAP SNAP Eligibility: Use the dropdown to select PDAP Eligibility for the applicable month.</p> <p>Activity Type: Select approved Activity Type based on Budget Summary. Activity Subtype: Select applicable subtype for the Activity Type. Basic Education: GED, Vocational Training, Adult Basic Education, or Participant Reimbursement Job Search: Job Search, Job Search Training, Job Placement, Participant Reimbursement Work Experience/Training: Experience, On the Job Training, Participant Reimbursement Job Retention Services: Basic Education, Job Search, work Experience, Participant Reimbursement</p> <p>Activity Status: Select the applicable Status: • Open: Individual actively participating as expected. Do not enter a Status Change Date for Open status. • Ended: Individual has stopped participating. Enter Status Change Date as the last day of participation. • Completed: Individual has successfully finished Activity Type. Enter Status Change Date of completion.</p> <p>Status Change Date: Enter the date based on the Status instruction.</p> <p>On Invoice: Use the dropdown to select Yes if the individual is counted on the invoice for the Activity Type; otherwise, select No.</p>																			

DOCUMENTATION

Maintain electronic or paper records and documents relevant to E&T activities for three (3) years from the date of the final payment and per the terms of the Agreement. If an audit, litigation, or other action involving records is initiated before the three (3) year period has expired, the Partner shall maintain records until issues arising out of such actions are resolved, or until additional three (3) year period has passed, whichever is later.

SNAP 3RD PARTY ELIGIBILITY

IDHW determines the SNAP eligibility and E&T exemptions for applicants.

E&T 3RD PARTY ELIGIBILITY

A SNAP participant can receive E&T services from a Partner under the 3rd Party program, if they are:

- Active on SNAP for the entire month,
- SNAP participants registered with MAXIMUS,
- 16 years or older, and
- Not receiving TANF/TAFI assistance.

PROGRAM MATERIALS

E&T 3rd Party program materials are available on the Resource website. Do not modify or edit formatting of materials without consent from IDHW.

APPENDIX

The FNS E&T Toolkit details guidance for State SNAP E&T programs. The toolkit is available online at https://www.fns.usda.gov/sites/default/files/ET_Toolkit_2013.pdf.

IDHW SNAP WEBSITE

<https://www.livebetteridaho.org/top-level-services/food-and-nutrition>

STANDARD WORK PLAN PROCESS

REGULATIONS

- 2 CFR 170 REPORTING SUBAWARD AND EXECUTIVE COMPENSATION INFORMATION
- 2 CFR 200 UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS
- 2 CFR 25 UNIVERSAL IDENTIFIER AND SYSTEM FOR AWARD MANAGEMENT
- 7 CFR 15a—EDUCATION PROGRAMS OR ACTIVITIES RECEIVING OR BENEFITTING FROM FEDERAL FINANCIAL ASSISTANCE
- 7 CFR 15b—NONDISCRIMINATION ON THE BASIS OF HANDICAP IN PROGRAMS OR ACTIVITIES RECEIVING FEDERAL FINANCIAL ASSISTANCE
- 7 CFR 15c—NONDISCRIMINATION ON THE BASIS OF AGE IN PROGRAMS OR ACTIVITIES RECEIVING FEDERAL FINANCIAL ASSISTANCE FROM THE UNITED STATES DEPARTMENT OF AGRICULTURE
- 7 CFR 15d—NONDISCRIMINATION IN PROGRAMS OR ACTIVITIES CONDUCTED BY THE UNITED STATES DEPARTMENT OF AGRICULTURE
- 7 CFR 273 CERTIFICATION OF ELIGIBLE HOUSEHOLDS
- 7 CFR 277 PAYMENTS OF CERTAIN ADMINISTRATIVE COSTS OF STATE AGENCIES
- 7 CFR 3016 UNIFORM ADMINISTRATIVE REQUIREMENTS FOR GRANTS AND COOPERATIVE AGREEMENTS TO STATE AND LOCAL GOVERNMENTS
- 42 CFR
- Agricultural Act of 2014
- IDAPA 16.03.04 - Rules Governing the Department of Health and Welfare Food Stamp Program in Idaho
- OMB Circular A-102, Grants and Cooperative Agreements With State and Local Governments
- OMB Circular A-11, Preparation, Submission and Execution of the Budget

- OMB Circular A-110, Uniform Administrative Requirements for Grants and Other Agreements with Institutions of Higher Education, Hospitals and Other Non-Profit Organizations. Relocated to 2 CFR, Part 215
- OMB Circular A-122, Cost Principles for Non-Profit Organizations. Relocated to 2 CFR, Part 230
- OMB Circular A-133, Audits of States, Local Governments and Non-Profit Organizations
- OMB Circular A-21, Cost Principles for Education Institutions. Relocated to 2 CFR, Part 220
- OMB Circular A-87, Cost Principles for State, Local and Indian Tribal Governments. Relocated to 2 CFR, Part 225